## Sills Cummis & Gross

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October 26, 2023

## By ECF

Hon. Cathy L. Waldor, U.S.M.J. US District Court, District of NJ 50 Walnut Street Newark, NJ 07101

Re: Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC Civil Action No. 22-2632 (JMV-CLW)

Dear Judge Waldor:

In connection with our status conference scheduled for Monday, October 30 2023 at 1:30 pm, we wanted to call your attention to what we believe are the issues to be addressed, in the chronological order of filing:

- 1. SaveOn application to compel documents regarding JJHCS terms and conditions (ECF 146) (8/24/23) and JJHCS supplemental letter regarding benefits investigations (ECF 163) (10/24/23).
- 2. SaveOn application to force JJHCS to allow 12 of its highly confidential eyes-of-counsel only documents to be shared with non-parties Express Scripts and Accredo Health Group (ECF 149) (9/5/23).
- 3. SaveOn application to require JJHCS to produce documents regarding its finances (ECF 150) (9/7/23).
- 4. SaveOn application regarding JJHCS investigation of non-JJHCS personnel and compliance with June 29, 2023 order (ECF 162) (10/11/23).

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Hon. Cathy L. Waldor, U.S.M.J. October 26, 2023 Page 2

- 5. SaveOn application seeking 12 additional JJHCS custodians (ECF 165) (10/25/23).
- 6. SaveOn application regarding CAP search terms (ECF 166) (10/25/23).

Counsel for SaveOn asked me to share this agenda letter so that it could be a joint submission, but then withdrew his request, stating he intended to submit his own letter.

We look forward to our conference on Monday.

Respectfully yours,

/s/ Jeffrey J. Greenbaum

JEFFREY J. GREENBAUM

cc: All counsel of record (by ECF)